

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

**TAYLA GREENE As Administrator of the
Estate of the decedent RONALD GREENE**

Plaintiff,

vs.

DAKOTA DEMOSS, ET AL,

Defendants.

CIVIL ACTION NO. 3:20-CV-00578

JUDGE TERRY A. DOUGHTY

MAG. JUDGE KAYLA D. MCCLUSKY

**JOINT MOTION FOR MODIFICATION
OF THE SCHEDULING ORDER**

Plaintiff Tayla Greene, by and through undersigned counsel hereby files this Joint Motion for Alteration of the Scheduling Order in the above captioned matter. In support thereof, Plaintiff avers as follows:

1. On May 5, 2020, Plaintiff initiated this matter by filing a civil complaint averring violations of the constitutional rights of Plaintiff's decedent. (ECF No. 1)
2. On September 14, 2020 Defendants filed Motions to Dismiss Plaintiff's Claims. (ECF Nos. 20,22,23)
3. In response, Plaintiff filed an Amended Complaint on October 5, 2020. (ECF No. 25)
4. On October 26, 202 Defendants filed a Supplemental Motion to Dismiss the Amended Complaint. (ECF No. 31)
5. On December 29, 2020 this Honorable Court Denied Defendant's Motions to Dismiss and Directed Defendant's to Answer Plaintiff's Amended Complaint. (ECF No. 51)

6. On January 27, 2021 Defendants filed a Notice of Appeal of this Honorable Court's Judgment to the Fifth Circuit. (ECF No. 57)
7. On September 20, 2022 the Fifth Circuit denied Defendants' Appeal and returned jurisdiction of this matter to this Honorable Court. (ECF No. 120)
8. On December 17, 2022, this Honorable Court issued a Scheduling Order, setting trial for June 17, 2024.
9. Thereafter, on February 6, 2023, Defendants filed a Motion to Stay Proceedings pending the resolution of criminal charges against Defendants. (ECF No. 136)
10. On February 15, 2023, this Honorable Court Granted Defendants' Motion and stayed all deadlines. (ECF No. 139)
11. On February 17, 2025, Plaintiff filed a Motion to Lift the stay. (ECF No. 157)
12. On February 20, 2025, this Honorable Court lifted the stay. (ECF No. 158)
13. On September 3, 2025 the court issued the operative Case Management Order which contemplates the parties conducting damage and causation discovery and conducting a settlement conference in December 2025. (ECF No. 184)
14. The parties have completed critical document discovery and have received some 8000 documents, video files, and audio files from Louisiana State Police.
15. The parties have identified their respective experts related to the damages and causation phase of discovery.
16. The parties have agreed that the depositions of two individuals identified in said documents are critical to damage and causation evaluation of this matter. Specifically, the forensic pathologists who performed the autopsy of Plaintiff's decedent, Dr. Frank J. Peretti and Dr. Jennifer Forsyth.

17. Counsel for Defendant Hollingsworth, Scott Wolleson Esq. has communicated directly with both Dr. Perretti and Dr. Forsyth and was informed that they have no availability for deposition until January 2026 due to their trial testimony schedule and professional obligations.
18. The parties have agreed to take the deposition of Dr. Perretti on January 7, 2026 and Dr. Forsyth on January 8, 2026 in Little Rock Arkansas. (Exhibits A and B)
19. In addition to the above referenced depositions, the parties are seeking additional information potentially related to the damage and causation phase of discovery.
20. Specifically, Undersigned Counsel issued a *Touhy* request to the Federal Bureau of Investigation (FBI) seeking documents related to an “autopsy review” conducted at the direction of the FBI as part of their investigation of Ronald Greene's death. (Exhibit C)
21. The FBI’s initial response, Dated October 10, 2025 sought additional information related to Plaintiff’s request prior to producing the requested documents. (Exhibit D)
22. Undersigned has responded to the email provided by the FBI in an effort to supplement the information provided in Plaintiff’s *Touhy* letter and will continue to pursue the requested documents.
23. Finally, Counsel for Louisiana State Police, Jennie Pellegrin Esq., responded to an email from undersigned counsel on October 1, 2025 indicating that there are “...additional files that remain to be reviewed, (possibly) redacted and produced, but we estimate that our production will be completed by the end of the month”.
24. The parties therefore jointly and respectfully request that the Case Management Order be modified to reflect the challenges discussed above.
25. A Proposed Modified Scheduling Order is attached hereto as Exhibit E.
26. No parties will be prejudiced by modifying the current Scheduling Order.

/s/ Mark V. Maguire

McEldrew Purtell

Mark V. Maguire, Esq. John J. Coyle, Esq.

123 South Broad Street Suite 2250

Philadelphia, PA 19109

T: (215) 545-8800

F: (215) 545-8805

mmaguire@mceldrewpurtell.com

Attorney for Plaintiff

/s/ Erin B Rigsby

Chehardy, Shermman, Williams, Recile & Hayes

James M. Williams, Esq.

Erin B. Rigsby, Esq.

Inemesit U. O'Boyle, Esq.

1 Galleria Blvd Suite 1100

Metairie, LA 70001

T: (504) 962-4292

F: (504) 833-8080

E: james@thetrialteam.com

Attorney for Plaintiff

/s/ Charles Bryan Racer

Charles Bryan Racer

LA Dept of Justice Litigation Division

130 DeSiard Street, Suite 812 Monroe,

LA 71201

318-362-5250

Fax: 318-362-5259

Email: racerc@ag.state.la.us

Attorney for Dakota DeMoss

/s/ Patrick Scott Wolleson

Patrick Scott Wolleson

Breithaupt DuBos & Wolleson P O Box

14106

Monroe, LA 71207

318-322-1202

Fax: 318-322-1984

Email: scott@bdw.law

Attorney for Darby Hollingsworth

/s/ H Bradford Calvit

H Bradford Calvit

Provosty Sadler

4615 Parliament Dr Ste 200

Alexandria, LA 71315-3530

318-445-3631

Email: bcalvit@provosty.com

Attorney for Christopher Harpin

/s/ Lee J. Ledet

Lee J. Ledet

Ledet Law Group

P O Drawer 610

St Francisville, LA 70775 225-635-3921

Fax: 225-635-3292

Email: lee@ledetlawgroup.com

Attorney for Floyd McElroy

/s/ Darren A. Patin

Darren A. Patin

Hailey McNamara

3445 N Causeway Blvd Ste 800

Metairie, LA 70002

504-836-6500fax: 504-836-6565

Email: dpatin@hmlhp.com

Attorney for John Clary

/s/ Collin J. LeBlanc

Collin J. LeBlanc

Keogh Cox & Wilson P O Box 1151

Baton Rouge, LA 70821 225-383-3796

Fax: 225-343-9612

Email: cleblanc@kcwlw.com

Attorney for John Peters

/s/ Jay P. Adams

Jay P. Adams

Hudson Potts & Bernstein

1800 Hudson Ln, Suite 300

Monroe, LA 71201

318-388-4400

Email: jadams@hpblaw.com

Attorney for Kory York

CERTIFICATE OF SERVICE

I certify that the foregoing Consent Motion for Alteration of the Scheduling Order was filed via the Court's electronic filing system and thereby served upon all parties of record.

/s/ Mark V. Maguire

CERTIFICATE OF CONFERENCE

I certify that Plaintiff's counsel met and conferred with defense counsel in this action on October 10, 2025. I further certify that all parties consent to this motion.

/s/ Mark V. Maguire

Dated: October 17, 2025